

Comments on NJDEP White Paper: VOC010 - Architectural and Industrial Maintenance Coatings

Control Measure Summary from NJDEP White Paper: Amend N.J.A.C. 7:27-23 (architectural coatings) based on CARB survey data	Comments on NJDEP White Paper
Comparison of existing VOC limits in NJ, SCAQMD and proposed CARB limits:	The NJDEP provides no units of measure for the values provided within the table. When compared to N.J.A.C. 7:27-23, the values presented appear to be grams of volatile organic compounds (VOC) per Liter of coating.
Implementation: Reformulate products to meet new VOC limits, or stop selling in NJ, unless an exemption is met.	It is clear that CARB anticipates using the 2004 survey information to justify emissions, which is currently incomplete. However, it is unclear when implementation is anticipated and whether or not there will be a grace period. It is also unclear whether the NJDEP intends to keep the same exclusions in Subchapter 23 upon implementation of these "new" limits. It is also unclear what "new" limits the NJDEP is proposing (see next comment).
Effectiveness: Split the difference between the SCAQMD rules and the OTC model rule for most categories. For the top five categories - assumed 75% toward SCAQMD limits. Approximately 4 tons/day reduction of VOC in NJ.	The basis for the anticipated 4 ton/day reduction of VOC in NJ is not provided, nor are the baseline emissions based on the current Subchapter 23 limits. Further, it is very unclear what "new" limits the NJDEP is proposing. The White Paper provides a cryptic statement that, "the Ozone Transport Committee (OTC) split the difference between the SCAQMD rules and the existing OTC model rule VOC limits for most categories, except for the top five categories in sales, in which they went 75 percent of the way toward the SCAQMD limits." If the NJDEP has proposed limits they intend to implement, they should be clearly presented so affected sources can assess their potential impact and provide constructive comments.
Cost Effectiveness: SCAQMD estimated the cost-effectiveness to be in the range of \$4,229/ton to \$11,405/ton	The range is considerable and warrants a justification for the variance. The basis for the range in cost-effectiveness is not provided. However, the SCAQMD's 2003 Air Quality Management Plan, which is cited as a source for this White Paper, identifies a cost-effectiveness of \$20,000 per ton in Appendix IV-A. The White Paper statement that the cost of compliance will be less for New Jersey because the one-time research and reformulation costs have already been incurred for products sold in California is not substantiated. The statement assumes that the market and products in New Jersey and California are identical, with no data provided to support that inference.